UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK
---X

DOV HIKIND,   Civil Action No. _____

              Plaintiff,

-against-

ALEXANDRIA OCASIO-CORTEZ,

              Defendant.

---X

COMPLAINT FOR DECLARATORY AND INJUNCTIVE RELIEF

PRELIMINARY STATEMENT:

1.   Plaintiff, Dov Hikind ("Mr. Hikind" or "Plaintiff"), is a known and staunch advocate for Jewish causes and the State of Israel. Mr. Hikind is the founder of Americans Against Anti-Semitism. Importantly, Mr. Hikind has criticized Defendant, Alexandria Ocasio-Cortez ("AOC" or "Defendant"), via Twitter on multiple occasions, most recently in response to AOC's claims that the United States Government is running "concentration camps" on the boarder, similar to those in the Holocaust.

2.   Mr. Hikind has been blocked by Defendant from the @AOC account because of opinions he expressed regarding AOC and in reply to Defendant's tweets.

3.   Because of Plaintiff's criticisms of AOC, Mr. Hikind has been prevented or impeded from viewing AOC's tweets, from replying to the tweets, from viewing discussions associated with the tweets, and from participating in those discussions.

4.   Alexandria Ocasio-Cortez is a popular elected member of the United States House of Representatives. AOC maintains an active Twitter account with the handle @AOC. This is AOC's verified Twitter account and is the account to which AOC regularly posts and engages in

both news, events, political speech, and advocates for her positions. AOC uses Twitter as an important public forum for speech.

5. In an effort to suppress contrary views, Defendant has excluded Twitter users who have criticized AOC and her positions as a Congresswoman via "blocking". This practice is unconstitutional and must end.

6. This very practice has been litigated with regard to President Donald Trump blocking individuals on Twitter, and has recently been found unconstitutional.

7. The Supreme Court has acknowledged that social media is a "vast democratic forum" analogous to traditional public forums, such as parks. *See Packingham v. North Carolina,* ___ U.S. ____, 137 S. Ct. 1730, 1735-36, 198 L. Ed. 2d 273 (2017). As the Second Circuit Court of Appeals recognized today, July 9, 2019, it is unconstitutional to for a political figure to "engage in viewpoint discrimination by utilizing Twitter's 'blocking' function to limit certain users access to [a] social media account, which is otherwise open to the public at large, because [they] disagree with their speech." *Knight First Amendment Institute, et. al., v. Donald J. Trump, et. al.*, No. 18-1691-cv, slip op. at 4 (2d Cir. 2019) (decided July 9, 2019). Twitter is an interactive space which is a designated public forum. *Knight First Amendment Institute v. Trump*, 302 F. Supp. 3d 541, 574 (S.D.N.Y. 2018).

8. The manner in which AOC uses the @AOC Twitter account makes it a public forum under the First Amendment. Defendant's account is open and accessible to all taking advantage of Twitter's interactive platform to directly engage the AOC's 4.7 million followers. AOC's tweets routinely generate comments both on Twitter and in the general media.

9.   AOC uses Twitter to make formal announcements, opine on a range of social matters both domestic and abroad, endorse candidates, engage with follows of her account, promote Defendant's agenda, and other matters.

10.   AOC uses @AOC far more than her other Twitter handle of @repAOC. Defendant's use of @AOC is often multiple times a day with millions of followers. AOC's @repAOC only has 171,000 followers with irregular posting. Defendant's @AOC handle on Twitter is her primary public forum on that platform.

11.   AOC's actions violate the First Amendment rights of Mr. Hikind, others like Mr. Hikind, and those who follow the @AOC account and are now deprived of their right to read the speech of the dissenters who have been blocked.

12.   Plaintiff respectfully ask that this Court declare that the viewpoint-based exclusion occurring here violates the First Amendment, order the Defendant to restore Mr. Hikind's access, and bar Defendant from blocking access to her twitter account.

JURISDICTION AND VENUE

13.   This Court has jurisdiction over this action pursuant to 28 U.S.C. § 1331 and 28 U.S.C. §§ 2201–2202.

14.   Venue is proper in this Court under 28 U.S.C. § 1391(b)(2) and (e)(1). A substantial part of the events giving rise to this claim occurred in this District, and Defendant is a member of the United States Congress with an active office within the district.

PARTIES

15.   Dov Hikind, is now a private citizen who founded and runs an advocacy organization called Americans Against Anti-Semitism. Mr. Hikind holds a strong public

presence due to his advocacy involving both domestic and international matters concerning the

Jewish people. Mr. Hikind lives in Kings County, New York and is a former New York State

Assemblyman. Mr. Hikind maintains an active verified Twitter account under the handle

@HikindDov

16.   Defendant Alexandria Ocasio-Cortez is a Congresswoman representing the 14th

District in New York State, which encompasses parts of the Bronx and Queens. AOC operates

and/or oversees the operation of a verified Twitter account under the handle @AOC. Defendant,

and/or her agents, have blocked Plaintiff from her @AOC account.

FACTUAL ALLEGATIONS

17.   Twitter is a social media platform with millions active users worldwide, including

some 70 million in the United States. The platform allows users to publish short messages, to

republish or respond to others' messages, and to interact with other Twitter users in relation to

those messages. Speech posted on Twitter ranges from comedy to commentary, but particularly

relevant here is that a significant amount of speech posted on the platform is speech by, to, or

about the government.

18.   A Twitter "user" is an individual who has created an account on the platform. A

user can post "tweets," which contain short messages, to a webpage on Twitter that is the user's

account. Tweets can include photographs, videos, and links.

19.   A Twitter user's webpage displays all tweets generated by the user, with the most

recent tweets appearing at the top of the page. This display is known as a user's "timeline."

When a user generates a tweet, the timeline updates immediately to include that tweet. Anyone

who can view a user's public Twitter webpage can see the user's timeline.

20.   A Twitter user must have an account name, which is an @ symbol followed by a unique identifier (e.g., @AOC), and a descriptive name (e.g., Alexandria Ocasio-Cortez). The account name is called the user's "handle." Alongside the handle, a user's webpage will display the date the user joined Twitter and a button that invites others to "Tweet to" the user. A user's Twitter webpage may also include a short biographical description; a profile picture, such as a headshot; a "header" image, which appears as a banner at the top of the webpage; the user's location; a button labeled "Message," which allows two users to correspond privately; and a small sample of photographs and videos posted to the user's timeline, which link to a full gallery. Thus, part of the webpage for Defendant looks as follows:

21.   Twitter is set to be publicly accessible by default. Even those without twitter accounts can have access to view a user's page, though they cannot interact with the twitter platform.

22.   The interaction users have on Twitter with one another is comprehensive: they can direct message privately, publicly, re-tweet each other, favorite/like each other's comments, engage in multiple person discussion via a twitter thread which stems from the initial post.

23.   Importantly, users can mention each other causing the mentioned user to receive a notification of the post they are mentioned in.

24.   Twitter does engage a privacy option which allows for "Protected" tweets.

25.   A user whose account is public, such as AOC, but who wants to make his or her tweets invisible to another user can do so by "blocking" that user. "Blocking" must be affirmatively done by the user. A user who blocks another user prevents the blocked user from interacting with the first user's account on the Twitter platform. A blocked user cannot see or reply to the blocking user's tweets, view the blocking user's list of followers or followed accounts, or use the Twitter platform to search for the blocking user's tweets. The blocking user will not be notified if the blocked user mentions her; nor will the blocking user see any tweets posted by the blocked user.

26.   When the blocked user attempts to follow the blocking user, or to access the Twitter webpage from which the user is blocked, the user will see a message indicating that the other user has blocked him or her from following the account and viewing the tweets associated with the account. This is an example of a notification from Twitter that a user has been blocked:

THE @AOC ACCOUNT:

27.   Defendant has been a public member of twitter since April 2010. In 2018, AOC was elected to Congress. During her campaign and after, Defendant has regularly used Twitter

as way to communicate her views, positions, advocate for matters, comment on other tweets, re-tweet, and block those whom she does not agree with.

28.   AOC has following of over 4.7 million followers on Twitter.

29.   AOC regularly posts political messages of both a public nature. Defendants twitter page was active with over 17 tweets and re-tweets between July 8, 2019 and July 9, 2019 alone. Each of these tweets involves a public interest and matters of official capacity, such as immigration, climate change, public housing, among other topics. These tweets alone contain over 200,000 likes; 50,000 re-tweets; and approximately 20,000 comments.

30.   AOC also directly asks for comments from the public on her Twitter page, such as from a tweet on July 7, 2019: "What's your favorite US National Park to visit? (Any tips for visiting said park also welcome!)".

DEFENDANT'S BLOCKING MR. HIKIND FROM @AOC ACCOUNT

31.   Plaintiff, a twitter user with the twitter handle @hikindDov, with over 21,000 followers.

32.   Mr. Hikind, who is critical of Defendant on a regular basis, was blocked on July 8, 2019 by AOC from the @AOC account.

33.   Mr. Hikind, a staunch supporter of Israel and founder of Americans Against Anti-Semitism, often posts comments and replies in relation to tweets and or news relating to AOC's positions.

34.   Mr. Hikind is **not** the only one critical of Defendant whom AOC has blocked: Elizabeth Wheeler, an on-air personality and author; Harry Cherry, a Jewish journalist; Ryan Saavedra, a reporter for the Daily Wire; and the student origination "Students for Trump" have all been blocked as well.

35.   Defendant's blocking of Mr. Hikind, and others like him, from the @AOC

account prevents or impedes the viewing of Defendant's tweets; from replying to these tweets;

from viewing the comment threads associated with these tweets; and from participating in the

comment threads.

36.   Mr. Hikind, a staunch supporter of Jewish values, against Anti-Semitism, and

Israel, was blocked by AOC purely because of his speech in support of Jewish values and Israel.

37.   As the Second Circuit Court of Appeals declared today "if the First Amendment means anything, it means that the best response to disfavored speech on matters of public concern is more speech, not less." *See Knight First Amendment Institute*, No. 18-1691-cv, slip op. at 29 (2d Cir. 2019) (decided July 9, 2019)

CAUSE OF ACTION
Violation of the First Amendment of the U.S. Constitution
(Declaratory and Injunctive Relief)

38.   Plaintiff repeats the allegations set forth above as if fully set forth herein.

39.   Defendant's blocking of the Plaintiff from the @AOC account violates the First Amendment because it imposes a viewpoint-based restriction on Mr. Hikind's participation in a public forum.

40.   Defendant's blocking Plaintiff from the @AOC account violates the First Amendment because it imposes a viewpoint-based restriction on the Mr. Hikind's access to official statements AOC otherwise makes available to the general public.

41.   Defendant's blocking of the Plaintiff from the @AOC account violates the First Amendment because it imposes a viewpoint-based restriction on the Plaintiff's ability to petition the government for redress of grievances.

42.   Defendant's blocking of Plaintiff from the @AOC account violates the First Amendment because it imposes a viewpoint-based restriction on the right to hear views expressed.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff request that this Court:

A.   Declare Defendant's viewpoint-based blocking of Plaintiff from the @AOC Twitter account to be unconstitutional;

    B. Enter an injunction requiring Defendant to unblock Plaintiff from the @AOC

Twitter account, and prohibit Defendant from blocking the Plaintiff, and others similarly

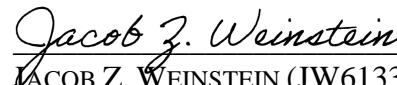situated, from the account on the basis of viewpoint;

    C. Award Plaintiff costs, including reasonable attorney's fees, pursuant to 28 U.S.C.

§ 2412; and

    D. Grant any additional relief as may be just and proper.

Dated: July 9, 2019   Respectfully submitted,
    Queens, New York

                   WEINSTEIN & WEINSTEIN, LLP

Jacob Z. Weinstein
                   JACOB Z. WEINSTEIN (JW6133)
                   ISRAEL D. WEINSTEIN (IW6133)
                   68-15 MAIN STREET, SECOND FLOOR
                   FLUSHING, NEW YORK 11367
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CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. *(SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)*

I. (a) PLAINTIFFS
DOV HIKIND

DEFENDANTS
ALEXANDRIA OCASIO-CORTEZ

(b) County of Residence of First Listed Plaintiff Kings County
(EXCEPT IN U.S. PLAINTIFF CASES)

County of Residence of First Listed Defendant Bronx County
(IN U.S. PLAINTIFF CASES ONLY)
NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF
THE TRACT OF LAND INVOLVED.

(c) Attorneys *(Firm Name, Address, and Telephone Number)*
Weinstein & Weinstein, LLP, 68-15 Main St. 2d Fl. Flushing, NY 11367
646-450-3484

Attorneys *(If Known)*

II. BASIS OF JURISDICTION *(Place an "X" in One Box Only)*

❏ 1 U.S. Government Plaintiff	☒ 3 Federal Question *(U.S. Government Not a Party)*
❏ 2 U.S. Government Defendant	❏ 4 Diversity *(Indicate Citizenship of Parties in Item III)*

III. CITIZENSHIP OF PRINCIPAL PARTIES *(Place an "X" in One Box for Plaintiff*
(For Diversity Cases Only) and One Box for Defendant)*

	PTF	DEF		PTF	DEF
Citizen of This State	❏ 1	❏ 1	Incorporated *or* Principal Place of Business In This State	❏ 4	❏ 4
Citizen of Another State	❏ 2	❏ 2	Incorporated *and* Principal Place of Business In Another State	❏ 5	❏ 5
Citizen or Subject of a Foreign Country	❏ 3	❏ 3	Foreign Nation	❏ 6	❏ 6

IV. NATURE OF SUIT *(Place an "X" in One Box Only)*

CONTRACT	TORTS		FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES
❏ 110 Insurance	**PERSONAL INJURY**	**PERSONAL INJURY**	❏ 625 Drug Related Seizure of Property 21 USC 881	❏ 422 Appeal 28 USC 158	❏ 375 False Claims Act
❏ 120 Marine	❏ 310 Airplane	❏ 365 Personal Injury - Product Liability	❏ 690 Other	❏ 423 Withdrawal 28 USC 157	❏ 376 Qui Tam (31 USC 3729(a))
❏ 130 Miller Act	❏ 315 Airplane Product Liability	❏ 367 Health Care/			❏ 400 State Reapportionment
❏ 140 Negotiable Instrument	❏ 320 Assault, Libel &	Pharmaceutical		**PROPERTY RIGHTS**	❏ 410 Antitrust
❏ 150 Recovery of Overpayment & Enforcement of Judgment	Slander	Personal Injury Product Liability		❏ 820 Copyrights	❏ 430 Banks and Banking
❏ 151 Medicare Act	❏ 330 Federal Employers' Liability	❏ 368 Asbestos Personal Injury Product		❏ 830 Patent	❏ 450 Commerce
❏ 152 Recovery of Defaulted Student Loans (Excludes Veterans)	❏ 340 Marine	Liability		❏ 840 Trademark	❏ 460 Deportation
	❏ 345 Marine Product Liability	**PERSONAL PROPERTY**	**LABOR**	**SOCIAL SECURITY**	❏ 470 Racketeer Influenced and Corrupt Organizations
❏ 153 Recovery of Overpayment of Veteran's Benefits	❏ 350 Motor Vehicle	❏ 370 Other Fraud	❏ 710 Fair Labor Standards Act	❏ 861 HIA (1395ff)	❏ 480 Consumer Credit
❏ 160 Stockholders' Suits	❏ 355 Motor Vehicle Product Liability	❏ 371 Truth in Lending	❏ 720 Labor/Management Relations	❏ 862 Black Lung (923)	❏ 490 Cable/Sat TV
❏ 190 Other Contract	❏ 360 Other Personal Injury	❏ 380 Other Personal Property Damage	❏ 740 Railway Labor Act	❏ 863 DIWC/DIWW (405(g))	❏ 850 Securities/Commodities/ Exchange
❏ 195 Contract Product Liability	❏ 362 Personal Injury - Medical Malpractice	❏ 385 Property Damage Product Liability	❏ 751 Family and Medical Leave Act	❏ 864 SSID Title XVI	❏ 890 Other Statutory Actions
❏ 196 Franchise			❏ 790 Other Labor Litigation	❏ 865 RSI (405(g))	❏ 891 Agricultural Acts
			❏ 791 Employee Retirement		❏ 893 Environmental Matters
REAL PROPERTY	**CIVIL RIGHTS**	**PRISONER PETITIONS**	Income Security Act	**FEDERAL TAX SUITS**	❏ 895 Freedom of Information Act
❏ 210 Land Condemnation	☒ 440 Other Civil Rights	**Habeas Corpus:**		❏ 870 Taxes (U.S. Plaintiff or Defendant)	❏ 896 Arbitration
❏ 220 Foreclosure	❏ 441 Voting	❏ 463 Alien Detainee		❏ 871 IRS—Third Party 26 USC 7609	❏ 899 Administrative Procedure Act/Review or Appeal of Agency Decision
❏ 230 Rent Lease & Ejectment	❏ 442 Employment	❏ 510 Motions to Vacate Sentence			
❏ 240 Torts to Land	❏ 443 Housing/ Accommodations	❏ 530 General			❏ 950 Constitutionality of State Statutes
❏ 245 Tort Product Liability	❏ 445 Amer. w/Disabilities - Employment	❏ 535 Death Penalty	**IMMIGRATION**		
❏ 290 All Other Real Property	❏ 446 Amer. w/Disabilities - Other	**Other:**	❏ 462 Naturalization Application		
	❏ 448 Education	❏ 540 Mandamus & Other	❏ 465 Other Immigration Actions		
		❏ 550 Civil Rights			
		❏ 555 Prison Condition			
		❏ 560 Civil Detainee - Conditions of Confinement			

V. ORIGIN *(Place an "X" in One Box Only)*

☒ 1 Original Proceeding   ❏ 2 Removed from State Court   ❏ 3 Remanded from Appellate Court   ❏ 4 Reinstated or Reopened   ❏ 5 Transferred from Another District *(specify)*   ❏ 6 Multidistrict Litigation

VI. CAUSE OF ACTION
Cite the U.S. Civil Statute under which you are filing *(Do not cite jurisdictional statutes unless diversity)*:
First Amendment to the U.S. Constitution
Brief description of cause:
Violation of the First Amendment to the U.S. Constitution by Defendant

VII. REQUESTED IN COMPLAINT:
❏ CHECK IF THIS IS A **CLASS ACTION** UNDER RULE 23, F.R.Cv.P.
DEMAND $
CHECK YES only if demanded in complaint:
JURY DEMAND: ❏ Yes   ❏ No

VIII. RELATED CASE(S) IF ANY
(See instructions):
JUDGE _____   DOCKET NUMBER _____

DATE
07/09/2019

SIGNATURE OF ATTORNEY OF RECORD
Jacob Z. Weinstein

FOR OFFICE USE ONLY

RECEIPT # _____   AMOUNT _____   APPLYING IFP _____   JUDGE _____   MAG. JUDGE _____

CERTIFICATION OF ARBITRATION ELIGIBILITY

Local Arbitration Rule 83.7 provides that with certain exceptions, actions seeking money damages only in an amount not in excess of $150,000, exclusive of interest and costs, are eligible for compulsory arbitration. The amount of damages is presumed to be below the threshold amount unless a certification to the contrary is filed.

Case is Eligible for Arbitration ☐

I, Jacob Z. Weinstein _____, counsel for _____ Plaintiff _____, do hereby certify that the above captioned civil action is ineligible for compulsory arbitration for the following reason(s):

☐   monetary damages sought are in excess of $150,000, exclusive of interest and costs,

☑   the complaint seeks injunctive relief,

☐   the matter is otherwise ineligible for the following reason

DISCLOSURE STATEMENT - FEDERAL RULES CIVIL PROCEDURE 7.1

Identify any parent corporation and any publicly held corporation that owns 10% or more or its stocks:

RELATED CASE STATEMENT (Section VIII on the Front of this Form)

Please list all cases that are arguably related pursuant to Division of Business Rule 50.3.1 in Section VIII on the front of this form. Rule 50.3.1 (a) provides that "A civil case is "related" to another civil case for purposes of this guideline when, because of the similarity of facts and legal issues or because the cases arise from the same transactions or events, a substantial saving of judicial resources is likely to result from assigning both cases to the same judge and magistrate judge." Rule 50.3.1 (b) provides that " A civil case shall not be deemed "related" to another civil case merely because the civil case: (A) involves identical legal issues, or (B) involves the same parties." Rule 50.3.1 (c) further provides that "Presumptively, and subject to the power of a judge to determine otherwise pursuant to paragraph (d), civil cases shall not be deemed to be "related" unless both cases are still pending before the court."

NY-E DIVISION OF BUSINESS RULE 50.1(d)(2)

1.)   Is the civil action being filed in the Eastern District removed from a New York State Court located in Nassau or Suffolk County?   ☐ Yes   ☑ No

2.)   If you answered "no" above:
a) Did the events or omissions giving rise to the claim or claims, or a substantial part thereof, occur in Nassau or Suffolk County?   ☐ Yes   ☑ No

b) Did the events or omissions giving rise to the claim or claims, or a substantial part thereof, occur in the Eastern District?   ☑ Yes   ☐ No

c) If this is a Fair Debt Collection Practice Act case, specify the County in which the offending communication was received: _____.

If your answer to question 2 (b) is "No," does the defendant (or a majority of the defendants, if there is more than one) reside in Nassau or Suffolk County, or, in an interpleader action, does the claimant (or a majority of the claimants, if there is more than one) reside in Nassau or Suffolk County? _____ ☐ Yes   ☑ No _____
(Note: A corporation shall be considered a resident of the County in which it has the most significant contacts).

BAR ADMISSION

I am currently admitted in the Eastern District of New York and currently a member in good standing of the bar of this court.

☑   Yes   ☐   No

Are you currently the subject of any disciplinary action (s) in this or any other state or federal court?

☐   Yes   (If yes, please explain   ☑   No

I certify the accuracy of all information provided above.

Signature: _____ *Jacob Z. Weinstein* _____

Last Modified: 11/27/2017

AO 440 (Rev. 06/12) Summons in a Civil Action

UNITED STATES DISTRICT COURT
for the

Eastern District of New York

Dov Hikind	)	
	)	
	)	
	)	
Plaintiff(s)	)	
v.	)	Civil Action No.
Alexandria Ocasio-Cortez	)	
	)	
	)	
	)	
	)	
Defendant(s)	)	

SUMMONS IN A CIVIL ACTION

To: *(Defendant's name and address)* Alexandria Ocasio-Cortez
Washington, DC Office   Jackson Hights Office
229 Cannon HOB   74-09 37th Avenue Ste 305
Washington, DC 20515   Jackson Heights, NY 11372

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

DOUGLAS C. PALMER
CLERK OF COURT

Date: _____   _____
                                                          Signature of Clerk or Deputy Clerk

AO 440 (Rev. 06/12) Summons in a Civil Action (Page 2)

Civil Action No.

PROOF OF SERVICE
(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (l))

This summons for *(name of individual and title, if any)* _____

was received by me on *(date)* _____ .

❐ I personally served the summons on the individual at *(place)* _____

_____ on *(date)* _____ ; or

❐ I left the summons at the individual's residence or usual place of abode with *(name)* _____

_____ , a person of suitable age and discretion who resides there,

on *(date)* _____ , and mailed a copy to the individual's last known address; or

❐ I served the summons on *(name of individual)* _____ , who is

designated by law to accept service of process on behalf of *(name of organization)* _____

_____ on *(date)* _____ ; or

❐ I returned the summons unexecuted because _____ ; or

❐ Other *(specify):*

My fees are $ _____ for travel and $ _____ for services, for a total of $ 0.00 .

I declare under penalty of perjury that this information is true.

Date: _____

_____
Server's signature

_____
Printed name and title

_____
Server's address

Additional information regarding attempted service, etc: